## **EXHIBIT-B**

Case 2:10-cv-10978-PJD-MJH

FILED

2010 NOV -3 P 3: 01

### UNITED STATES DISTRICT COURT IN THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

U.S. DICT. COURT CLERK EAST DIST. MICH FLINT

AMERICAN UNIVERSITY OF ANTIGUA, COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH Judge Patrick J. Duggan Magistrate Judge

STEVEN WOODWARD,

Defendant,

Defendant's Response to Plaintiff's Renewed Motion for Preliminary Injunction

#### Defendant's Response to Plaintiff's Renewed Motion for Preliminary Injunction

#### List of Exhibits:

Exhibit 1: Email from "support-en@support.gandi.net"

Exhibit 2: www.aua-vet.com home page.

Exhibit 3: Description of what was modified on or about 4/19/2010.

Exhibit 4: Docket 1

Exhibit 5: www.aua-med.com

1) If the Plaintiff, American University of Antigua, AUA, had a case they would not needed an adjournment for 60 days, as per Docket 45, page 3, letter C.

Now the Plaintiff requests another injunction due to irreparable injury, which was previously found by the Court to be not needed.

Per 4/19/2010 hearing transcripts:

Page 58, line 13, The Court "I'm not satisfied that they're false, there's your problem; not yours, his too, okay."

page 60, line 14, The Court "so there won't be a preliminary injunction and that's what you're getting in your favor."

2) The Defendant was right by reinstating their Web site on their return from overseas. The Defendant notified the Court of their return, as requested by the Court and paid respect to the Court concerning the reinstatement of www.aua-med.com.

The Court has already established the following in Docket 37, page 4 "that it would be impossible in the time allowed to analyze the truth or falsehood of the various statements on Woodward's website, the Court suggested to Woodward the possibility of taking down his website until he returned to the country and could litigate this case".

The Plaintiff conveniently does not provide the Court with a complete and accurate representation of the home page for www.aua-med.com.

Omitted from Exhibit A, of Docket 45-2, page 2 of 2 (This is not the official American University of Antigua, AUA, site.)

This is yet another attempt by the Plaintiff to deceive the Court.

3) The Defendants second website is a mirror site (a back-up, safe stored copy), of which was established on or about 9/23/2009, prior to the Plaintiff's filing their claims on or about 3/11/2010, Docket 1(Exhibit 4).

Exhibit 1 is the confirmation and registration of www.aua-vet.com, dated 9/23/2009.

Learn the truth about

# AMERICAN UNIVERSITY of ANTIGUA

**ENTER** 



(This is not the official American University of Antigua, AUA, site.)

EXHIBIT 2

The truth about American University...

9



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